

REMARKS

Claims 1, 3, 5-11, 22, 24, 26-32, 43, 45, and 47-53 are pending in this application. Claims 1, 5, 6, 22, 26, 27, 43, 47, 48, and 52 have been amended, and claims 2, 4, 12-21, 23, 25, 33-42, 44, 46, and 54-63 have been cancelled. Applicants have also amended the specification to correct minor typographical errors.

In the Office Action mailed November 15, 2006, the Examiner rejected claims 1-11, 22-32, and 43-51 under 35 U.S.C. § 102(e) as being anticipated by *Hillis et al.* (U.S. Patent Publication No. 2003/0196094).¹

Applicants respectfully traverse the Examiner's rejection of claims 1, 3, 5-11, 22, 24, 26-32, 43, 45, and 47-53 under 35 U.S.C. § 102(e). In order to properly establish that *Hillis et al.* anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

***Hillis et al.* fails to teach each and every recitation of the claims**

Amended independent claims 1 and 43, recite:

retrieving report information from a central data repository using one or more query statements;
generating a report using the report information;
generating a hash based on ingredient data related to the generation of the report, wherein the ingredient data comprises the

¹ Although the heading of the rejection only indicates claims 1-9, 22-30, and 43-51 as rejected, the body of the rejection rejects claims 1-11, 22-30, and 43-51. Applicants assume that it was the Examiner's intention to reject claims 1-11, 22-30, and 43-51 under 102(e) in view of *Hillis et al.*

report information, the one or more query statements, and at least one of a date and time the report was generated and a version of the report information;

storing the hash and the ingredient data in an ingredient database, the hash being associated with the ingredient data in the ingredient database; and

outputting the report, the report including the report information and a copy of the generated hash stored in the database, wherein the stored hash and the ingredient data may be subsequently accessed using the copy of the hash included in the report to verify the report information.

Amended independent claim 22, although of different scope, includes similar recitations. *Hillis et al.* fails to disclose each and every of these recitations.

For example, *Hillis et al.* discloses a method for authenticating the content of a distributed database. (*Hillis et al.*, ¶ 0002.) This is accomplished through “the computation and subsequent verification of a hash.” (*Id.* at ¶ 0005.) In particular, when “content is submitted to the database (1910), a hash is computed (1920) using a publicly distributed hashing algorithm and a publicly distributed key, if a key is needed.” (*Id.* at ¶ 0379.) *Hillis et al.* states that “[o]nce the hash is computed, it is associated with the submitted content (1930).” (*Id.*) “Subsequent users of the submitted content can then authenticate the content locally, by computing a hash using the publicly available algorithm, and comparing the hash obtained to the hash associated with the content (1960).” (*Id.* at ¶ 0381.) According to *Hillis et al.*, the data within the distributed database is classified as “data objects.” (*Id.* at ¶¶ 0173 and 0174.) The “type and content” of the data object is used in the computation of the hash. (*Id.* at ¶ 0242.)

However, the data object of *Hillis et al.* does not teach a “report,” as recited in independent claims 1, 22, and 43. Instead, as illustrated in FIG. 2 of *Hillis et al.*, the data object is a particular piece of data, such as a particular text, Web page, or picture,

(*Hillis et al.*, FIG. 2.) and it is not a “report” that is comprised of particular pieces of data (i.e., report information). *Hillis et al.* also does not disclose pieces of data that are retrieved from a central data repository and used to generate the report. Indeed, the data object of *Hillis et al.* is simply retrieved from either the World Wide Web or a registry server. (*Hillis et al.*, ¶ 0347.) Thus, *Hillis et al.* fails to disclose at least “generating a report using report information retrieved from a centralized data repository,” as recited in independent claims 1 and 43, and similarly recited in independent claim 22.

In addition, *Hillis et al.* also fails to disclose,

generating a hash based on ingredient data related to the generation of the report, wherein the ingredient data comprises the report information, the one or more query statements, and at least one of a date and time the report was generated and a version of the report information.

Instead, *Hillis et al.* discloses that “[w]hen a data object is registered in the system, its type and content are used to generate a fast, unique hash value, which is used as the aforementioned index into the registry.” (*Id.* at ¶ 0242.) *Hillis et al.* defines a “type” of data object as, “text, image, sound, video, and structured data.” (*Id.* at ¶¶ 0173-0176 and FIG. 2.) Therefore, a “type” of data object as disclosed by *Hillis et al.* cannot equate to “one or more query statements, and at least one of a date and time the report was generated, and a version of the report information,” as recited in independent claims 1, 22, and 43.

Moreover, it follows that because the data object of *Hillis et al.* does not equate to a report, *Hillis et al.* also fails to disclose,

outputting the report, the report including the report information and a copy of the generated hash stored in the database, wherein the stored hash and the ingredient data may be subsequently accessed using the copy of the hash included in the report to verify the report information.

As discussed above, *Hillis et al.* discloses that when data objects are entered into the registry, a hash value is generated and “used to identify and register the data object into the registry and is used as the index in the registry’s hash table.” (*Id.* at ¶ 242.) “Each registered data object 100 is represented as a hash table 69 entry 101.” (*Id.* at ¶ 0245.) As is further evidenced by FIGs. 17a and 17b of *Hillis et al.*, the hash values are only stored in a hash table. In fact, in order for a user to authenticate the data object, the user must recompute the hash value using a publicly available algorithm. (*Id.* at ¶ 0381.) As a result, *Hillis et al.* also fails to disclose “outputting the report, the report including the report information and a copy of the generated hash stored in the database,” as recited in independent claims 1 and 43, and similarly recited in independent claim 22.

Because *Hillis et al.* does not disclose each and every element of independent claims 1, 22, and 43, the rejection of these claims under 35 U.S.C. § 102(e) is legally deficient. Accordingly, Applicants respectfully request the withdrawal of the rejection and the timely allowance of claims 1, 22, and 43.

Dependent claims 3, 5-11, 24, 26-32, 45, and 47-53 are also not anticipated by *Hillis et al.* for at least the same reasons set forth above in connection with their respective independent claims 1, 22, and 43. Applicants therefore also respectfully

request the withdrawal of this rejection and the timely allowance of dependent claims 3, 5-11, 24, 26-32, 45, and 47-53.

Conclusion

The preceding arguments are based on the arguments presented in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The pending claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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